

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-
GBL-BMK

JOINT RESPONSE TO ORDER OF APRIL 5, 2017

Plaintiffs, Defendants, and Defendant-Intervenors (collectively, the “Parties”) respectfully submit this Joint Response to the Court’s Order of April 5, 2017. The Court has requested the “Petition Appendix” in this case in order to “aid the Court in understanding the oral argument that transpired before the United States Supreme Court.” Order, Dkt. No. 135. The Parties understand the Court to be requesting a copy of the Joint Appendix filed alongside the merits briefs.¹ That Joint Appendix, referenced in the Parties’ merits briefs and during oral argument before the Supreme Court, is 2,321 pages long and comprises six bound volumes. Given the large size of the Joint Appendix, the filing must be broken up into multiple docket entries for e-filing purposes. Plaintiffs will promptly e-file the Joint Appendix.

¹ Because this case was appealed on direct review, rather than certiorari review, to the Supreme Court, the Parties did not file a Petition Appendix.

Additionally, the Parties will be delivering courtesy hard copy volumes of the Joint Appendix to each chambers and will split among themselves the printing costs.

DATED: April 6, 2017

Respectfully submitted,

/s/ John K. Roche

John K. Roche, VSB No. 68594
Kevin J. Hamilton (admitted *pro hac vice*)
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: 202.434.1627
Facsimile: 202.654.9106

Attorneys for Plaintiffs

/s/ Stuart Raphael

Stuart Raphael, VSB No. 30380
**OFFICE OF THE ATTORNEY
GENERAL**
202 North 9th Street
Richmond, VA 23219
Telephone: 804.786.7240
Facsimile: 804.371.0200

Attorneys for Defendants

/s/ Effrem Mark Braden

Effrem Mark Braden (admitted *pro hac*
vice)

BAKER & HOSTETLER LLP (DC-NA)

Washington Square

Suite 1100

1050 Connecticut Ave NW

Washington, DC 20036

Telephone: 202. 861.1504

Facsimile: 202.861.1783

Attorneys for Defendant-Intervenors

CERTIFICATE OF SERVICE

On April 6, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Katherine Lea McKnight
Baker & Hostetler LLP (DC)
1050 Connecticut Ave NW
Suite 1100
Washington, DC 20036
202-861-1702
Fax: 202-861-1783
jwalrath@bakerlaw.com
kmcknight@bakerlaw.com

Effrem Mark Braden
Baker & Hostetler LLP (DC-NA)
Washington Square
Suite 1100
Washington, DC 20036
202-861-1504
Fax: 202-861-1783
mbraden@bakerlaw.com

Of counsel:

Dale Oldham, Esq.
1119 Susan St.
Columbia, SC 29210
803-772-7729
dloesq@aol.com

Attorneys for Defendant-Intervenors

Jeffrey P. Brundage
Daniel Ari Glass
Kathleen Angell Gallagher
Eckert Seamans Cherin & Mellott LLC
1717 Pennsylvania Ave NW, Suite 1200
Washington, D.C. 20006
202-659-6600
Fax: 202-659-6699
jbrundage@eckertseamans.com
dglass@eckertseamans.com
kgallagher@eckertseamans.com

Godfrey T. Pinn, Jr.
Harrell & Chambliss LLP
Eighth and Main Building
707 East Main Street
Suite 1000
Richmond, VA 23219
gpinn@hclawfirm.com

Anthony F. Troy
Eckert Seamans Cherin & Mellott LLC
707 East Main Street
Suite 1450
Richmond, Virginia 23219
804-788-7751
Fax: 804-698-2950
ttroy@eckertseamans.com

Attorneys for Defendants

By /s/ John K. Roche
John K. Roche (VSB #68594)
Perkins Coie LLP
700 13th St. N.W., Suite 600
Washington, D.C. 20005-3960
Phone: (202) 654-1627
Fax: (202) 654-9106
J@perkinscoie.com
Attorneys for Plaintiffs